

U.S. Department of the Interior
Bureau of Land Management
White River Field Office
220 E Market St
Meeker, CO 81641

CATEGORICAL EXCLUSION

NUMBER: DOI-BLM-CO-N05-2014-0109-CX

CASEFILE/PROJECT NUMBER: COC76618 (Temporary Use Permit for CPS 674)
COC76619 (Temporary Use Permit for CPS 1849)

PROJECT NAME: NWP Temporary Work Areas For CPS 674 and CPS 1849

LEGAL DESCRIPTION: Sixth Principal Meridian, Colorado

T. 2 N., R. 103 W., sec. 22, NE $\frac{1}{4}$ NW $\frac{1}{4}$.	}	COC76618
T. 2 N., R. 100 W., sec. 2, NW $\frac{1}{4}$ SE $\frac{1}{4}$.	}	COC76619

APPLICANT: Northwest Pipeline LLC

DESCRIPTION OF PROPOSED ACTION: Northwest Pipeline (NWP) has submitted applications to install additional deepwells directly adjacent to the existing wells at two cathodic protection sites (CPSs). The previously authorized and installed CPS 674, on the Igancio-Sumas pipeline, and CPS 1849, on the Piceance Creek pipeline, have depleted more rapidly than expected, and the new deepwells would be located within the existing right-of-way (ROW) areas. Temporary extra work space would be needed for activity associated with the new deepwells. NWP would use existing roads and the pipeline ROWs to access the CPS locations.

CPS 674: NWP would install an additional deepwell anode bed directly adjacent to the existing well. CPS 674 is located south of Highway 64 (west of Rangely, Colorado) in the Rangely Oil Field. The new well would be located within the existing ROW area authorized in COC74436. A new cable would be offset 5 ft from the existing cable and installed from the existing rectifier to the new deepwell. The existing cable would be disconnected and left in place. NWP would also remove some older facilities at the location and clean up the site. Three existing deepwells would be removed at CPS 674. The previously issued temporary use permit (COC74436-01) expired on 12/31/2012, however NWP would use only the area authorized by COC74436-01 and would adhere to all of the stipulations in the temporary use permit (TUP). The temporary work area would be 200 ft by 200 ft around the new deepwell, 127 ft long and 40 ft wide for the cable, and contain approximately 1.04 acres.

CPS 1849: NWP would install an additional deepwell directly adjacent to the existing well. CPS 1849 is located south of Highway 64 (at approximately mile marker 34 between Meeker and Rangely, Colorado) and east of BLM Road 1106. The new well would be located within the existing ROW area authorized in COC73952. The previously issued temporary use permit (COC73952-01) expired on 12/31/2011, however NWP would use only the area authorized by COC73952-01 and would adhere to all of the stipulations in the temporary use permit (TUP). NWP would tie the new deepwell into the existing cable. The temporary work area would be 150 ft by 150 ft and contain approximately 0.52 acres.

PLAN CONFORMANCE REVIEW: The Proposed Action is subject to and has been reviewed for conformance with (43 CFR 1610.5-3, BLM 1601.08) the following plan:

Name of Plan: White River Record of Decision and Approved Resource Management Plan (ROD/RMP).

Date Approved: July 1, 1997

Decision Number/Page: Page 2-49

Decision Language: "To make public lands available for the siting of public and private facilities through the issuance of applicable land use authorizations, in a manner that provides for reasonable protection of other resource values."

CATEGORICAL EXCLUSION REVIEW: The Proposed Action qualifies as a categorical exclusion under 516 DM 11.9, E19: *"Issuance of short-term (3 years or less) rights-of-way or land use authorizations for such uses as storage sites, apiary, sites, and construction sites where the proposal includes rehabilitation to restore the land to its natural or original condition"*.

The Proposed Action has been reviewed with the list of extraordinary circumstances (43 CFR 46.215) described in the table below.

Extraordinary Circumstance	YES	NO
a) Have significant adverse effects on public health and safety.		X
b) Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation, or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands; floodplains; national monuments; migratory birds; and other ecologically significant or critical areas.		X
c) Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources.		X
d) Have highly uncertain and potentially significant environmental		X

Extraordinary Circumstance	YES	NO
effects or involve unique or unknown environmental risks.		
e) Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects.		X
f) Have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects.		X
g) Have significant impacts on properties listed, or eligible for listing, in the National Register of Historic Places as determined by the bureau.		X
h) Have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species, or have adverse effects on designated Critical Habitat for these species.		X
i) Violate a Federal law, or a State, local or tribal law or requirement imposed for the protection of the environment.		X
j) Have a disproportionately high and adverse effect on low income or minority populations.		X
k) Limit access to and ceremonial use of Indian sacred sites on Federal lands by Indian religious practitioners or significantly affect the physical integrity of such sacred sites.		X
l) Contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species.		X

INTERDISCIPLINARY REVIEW:

The Proposed Action was presented to, and reviewed by, the White River Field Office interdisciplinary team on 7/22/2014. A complete list of resource specialists who participated in this review is available upon request from the White River Field Office. The table below lists resource specialists who provided additional remarks concerning cultural resources and special status species.

Name	Title	Resource	Date
Michael Selle	Archaeologist	Cultural Resources, Native American Religious Concerns	8/27/2014
Lisa Belmonte	Wildlife Biologist	Special Status Wildlife Species	7/28/2014
Justina Thorsen	Ecologist	Special Status Plant Species	7/22/2014

REMARKS:

Cultural Resources: **CPS 674** - The proposed deep well location and extra work area have been inventoried at the Class III (100 percent pedestrian) level (Kintz and Rockwell 2013, compliance

dated 1/8/2014) which did not identify any surface manifestation of cultural resources in the proposed work area. There is a very small possibility of subsurface remains that cannot be identified by surface inventory. The proposed project will not impact any known cultural resources.

CPS 1849 - The proposed deep well location and work area has been inventoried at the Class III (100 percent pedestrian) level (Hill and Nelson 2009, compliance dated 8/28/2009) with no surface manifestations of cultural resources in the location. While there is some potential for subsurface remains, the possibility is quite limited. The Proposed Action will not impact any known culture resources.

Native American Religious Concerns: No Native American religious concerns are known in the area, and none have been noted by Northern Ute Tribal authorities. Should recommended inventories or future consultations with Tribal authorities reveal the existence of such sensitive properties, appropriate mitigation and/or protection measures may be undertaken.

Paleontological Resources: **CPS 674** - The proposed deep well location and work area is located in an area generally mapped as the Mancos shale (Tweto 1979), which the BLM has categorized as a Potential Fossil Yield (PFYC) 3 formation. In many areas the Mancos Shale is known to produce scientifically noteworthy vertebrate fossil, but in the western end of Rio Blanco County, the area is not well understood and has not produce vertebrate fossils to date (c. Armstrong and Wolny 1989). Monitoring drilling operations for fossils is not practical, and there would be no way to identify and analyze any fossils that might be encountered during the drilling activity. Any impacts to fossils that might occur would represent an additional loss of scientific data from the regional paleontological data base that would be permanent, long term, irreversible, irretrievable, and virtually impossible to quantify.

CPS 1849 - The proposed deep well location and work area are located in an area generally mapped as the Wasatch Formation (Tweto 1979), which the BLM has categorized as a PFYC 5 formation indicating that it is known to produce scientifically noteworthy fossil resources (c. Armstrong and Wolny 1989). Monitoring drilling operations for fossils is not practical, and there would be no way to identify and analyze any fossil that might be encountered during the drilling activity. Any impacts to fossils that might occur would represent an additional loss of scientific data from the regional paleontological data base that would be permanent, long term, irreversible, irretrievable, and virtually impossible to quantify.

Special Status Wildlife Species: **CPS 674** - There are several special status species that are known to inhabit the area around this site including white-tailed prairie dog, burrowing owl, and ferruginous hawk. It is unlikely that the removal of one acre within the right-of-way will have any effective influence on any of these species. Any noise/activities associated with the Proposed Action would not be expected to disrupt breeding activities as work will be conducted outside of the reproductive period for all three species.

CPS 1849 - The CPS site is located in preliminary general habitat (PGH) for the greater sage-grouse, a candidate for listing under the Endangered Species Act (ESA) and a species considered sensitive by the BLM. There has been no evidence that the surrounding area has been occupied

by grouse for several decades. As such, the removal of half an acre of predominately herbaceous cover within the right-of-way would not be expected to have any conceivable influence on greater sage-grouse.

Special Status Plant Species: The nearest occurrence of special status plants to CPS 674 is a small population of Narrow stem gilia (*Aliciella stenothyrsa*) approximately 1,200 meters to the southwest. The nearest occurrence of special status plants to CPS 1849 is a population of Debris milkvetch (*Astragalus detritalis*) approximately 700 meters to the east. No potential habitat for special status plants occurs within 300 meters of either site. The Proposed Action is not expected to have any effects on special status plants due to distances of greater than 600 meters from the nearest known occurrences.

REFERENCES CITED:

- Armstrong, Harley J., and David G. Wolny
1989 Paleontological Resources of Northwest Colorado: A Regional Analysis. Museum of Western Colorado, Grand Junction, Colorado.
- Kintz, Kimberly, and Nicole Sauvageau Rockwell
2013 Chevron Corporation BLM Block Survey Phase I: A Class III Cultural Resource Inventory and Historical Analysis for BLM Managed Land in the Rangely Unit, Rio Blanco County, Colorado. Metcalf Archaeological Consultants, Inc., Grand Junction, Colorado.)13-54-02: OAHP 3 RB.LM.R1322)
- Hill, Brenda L. and Zachary Nelson
2009 A Class III Cultural Resource Inventory of Nine CPS Locations, Williams Northwest Pipeline, Rio Blanco County, Colorado. Entrix, Inc., Salt lake City, Utah. (09-174-02: OAHP # RB.LM.NR2149)
- Tweto, Ogden
1979 Geologic Map of Colorado. United States Geologic Survey, Department of the Interior, Reston, Virginia.

MITIGATION:

1. All applicable terms and conditions of the right-of-way grants for the cathodic protection sites (COC73952 and COC74436) and the previously authorized temporary use permits (COC73952-01 and COC74436-01) shall be carried forward and remain in full force and effect.
2. The holder shall conduct all activities associated with the operation and termination of the right-of-way within the authorized limits of the right-of-way.
3. At least 90 days prior to termination of the right-of-way, the holder shall contact the Authorized Officer to arrange a joint inspection of the right-of-way. The inspection will result in

the development of an acceptable termination and rehabilitation plan submitted by the holder. This plan shall include, but is not limited to, removal of facilities, drainage structures, and surface material; recontouring; topsoiling; or seeding. The Authorized Officer must approve the plan in writing prior to the holder's commencement of any termination activities.

4. The holder will be responsible for monitoring the right-of-way for occurrence of noxious weeds for the life of the project and appropriately treating weeds present. The holder will implement an integrated weed management plan according to BLM Manual 9015-Integrated Weed Management (BLM 1992). The weed management plan will include the submission of a Pesticide Use Proposal (PUP) to the BLM for the use of herbicides appropriate for control/eradication of the known noxious and invasive species along the proposed ROW including the species listed above. The PUP shall be filed in a timely manner such that weed treatment can begin in the first growing season after construction. Each fall the holder must submit a Pesticide Application Report (PAR) listing all weed treatments that occurred in association with this project.

5. All construction activity shall cease when soils or access routes become saturated to a depth of three inches unless there are safety concerns or activities are otherwise approved by the authorized officer.

6. In order to protect public land health standards for soils, erosion features such as rilling, gullying, piping and mass wasting on the surface disturbance or adjacent to the surface disturbance as a result of this action will be addressed immediately after observation by contacting the AO and by submitting a plan to assure successful soil stabilization with BMPs to address erosion problems.

7. As a reasonable and prudent ROW holder acting in good faith, the holder will report all emissions or releases that may pose a risk of harm to human health or the environment, regardless of a substance's status as exempt or nonexempt and regardless of fault, to the BLM WRFO (970) 878-3800.

8. As a reasonable and prudent ROW holder, acting in good faith, the holder will provide for the immediate clean-up and testing of air, water (surface and/or ground), and soils contaminated by the emission or release of any substance that may pose a risk of harm to human health or the environment, regardless of that substance's status as exempt or non-exempt. Where the holder fails, refuses, or neglects to provide for the immediate clean-up and testing of air, water (surface and/or ground), and soils contaminated by the emission or release of any quantity of a substance that poses a risk of harm to human health or the environment, the BLM WRFO may take measures to clean-up and test air, water (surface and/or ground), and soils at the holder's expense. Such action will not relieve the holder of any liability or responsibility.

9. Where required by law or regulation to develop a plan for the prevention of releases or the recovery of a release of any substance that poses a risk of harm to human health or the environment, the holder will provide a current copy of said plan to the BLM WRFO.

10. Construction sites and all facilities shall be maintained in a sanitary condition at all times;

waste materials shall be disposed of promptly at an appropriate waste disposal site. "Waste" means all discarded matter including, but not limited to, human waste, trash, garbage, refuse, oil drums, petroleum products, ashes, and equipment.

11. Comply with all Federal, State and/or local laws, rules and regulations, including but not limited to onshore orders and notices to lessees, addressing the emission of and/or the handling, use, and release of any substance that poses a risk of harm to human health or the environment. All spills or leakages of oil, gas, produced water, toxic liquids or waste materials, blowouts, fires, shall be reported by the operator in accordance with the regulations and as prescribed in applicable orders or notices.

12. The holder shall be responsible for achieving a reclamation success rate equal to a minimum cover and composition of 80 percent of the Desired Plant Community (as defined by the ecological site, in an early-seral state) or in relation to the seed mix applied within three growing seasons after the application of seed. This community must be capable of persisting on the site without intervention and allow for successional processes consistent with achieving the seral stage on the site prior to surface disturbance.

13. Reclamation achievement will be evaluated using the Public Land Health Standards that include Indicators of Rangeland Health. If BLM determines that reclamation success is below an acceptable level, reclamation efforts must be repeated at the holder's expense until vegetation is successfully established.

14. In accordance with the 1997 White River RMP/ROD, all trees removed in the process of construction shall be purchased from the BLM.

15. Trees that must be removed for construction shall be cut down to a stump height of six inches or less prior to heavy equipment operation. These trees shall be cut in four foot lengths (down to four inches diameter) and placed in manageable stacks immediately adjacent to a public road to facilitate removal for company use or removal by the public. Branches from cut trees will be scattered throughout the project area making sure not to creating a stockpile of wood debris.

16. All activities would be required to comply with all applicable local, state, and federal laws, statutes, regulations, standards, and implementation plans. This would include acquiring all required State and Rio Blanco County permits, implementing all applicable mitigation measures required by each permit, and effectively coordinating with existing ROW holders.

17. All construction and vehicular traffic shall be confined to the right-of-way or designated access routes, roads, or trails unless otherwise authorized in writing by the authorized officer. All temporary roads used for construction shall be rehabilitated after construction is completed.

COMPLIANCE PLAN: On-going compliance inspections and monitoring will be conducted by the BLM White River Field Office staff during and after construction. Specific mitigation developed in this document will be followed. The operator will be notified of compliance related

issues in writing, and depending on the nature of the issue(s), will be provided 30 days to resolve such issues.

NAME OF PREPARER: Stacey Burke

NAME OF ENVIRONMENTAL COORDINATOR: Heather Sauls

COMPLIANCE WITH NEPA:

The Proposed Action is categorically excluded from further documentation under the National Environmental Policy Act (NEPA) in accordance with 516 DM 11.9, E19. This categorical exclusion is appropriate in this situation because there are no extraordinary circumstances potentially having effects that may significantly affect the environment. The Proposed Action has been reviewed, and none of the extraordinary circumstances described in 43 CFR 46.215 apply.

SIGNATURE OF AUTHORIZED OFFICIAL:

A handwritten signature in blue ink, appearing to read "Kent E. Walter", is written over a horizontal line.

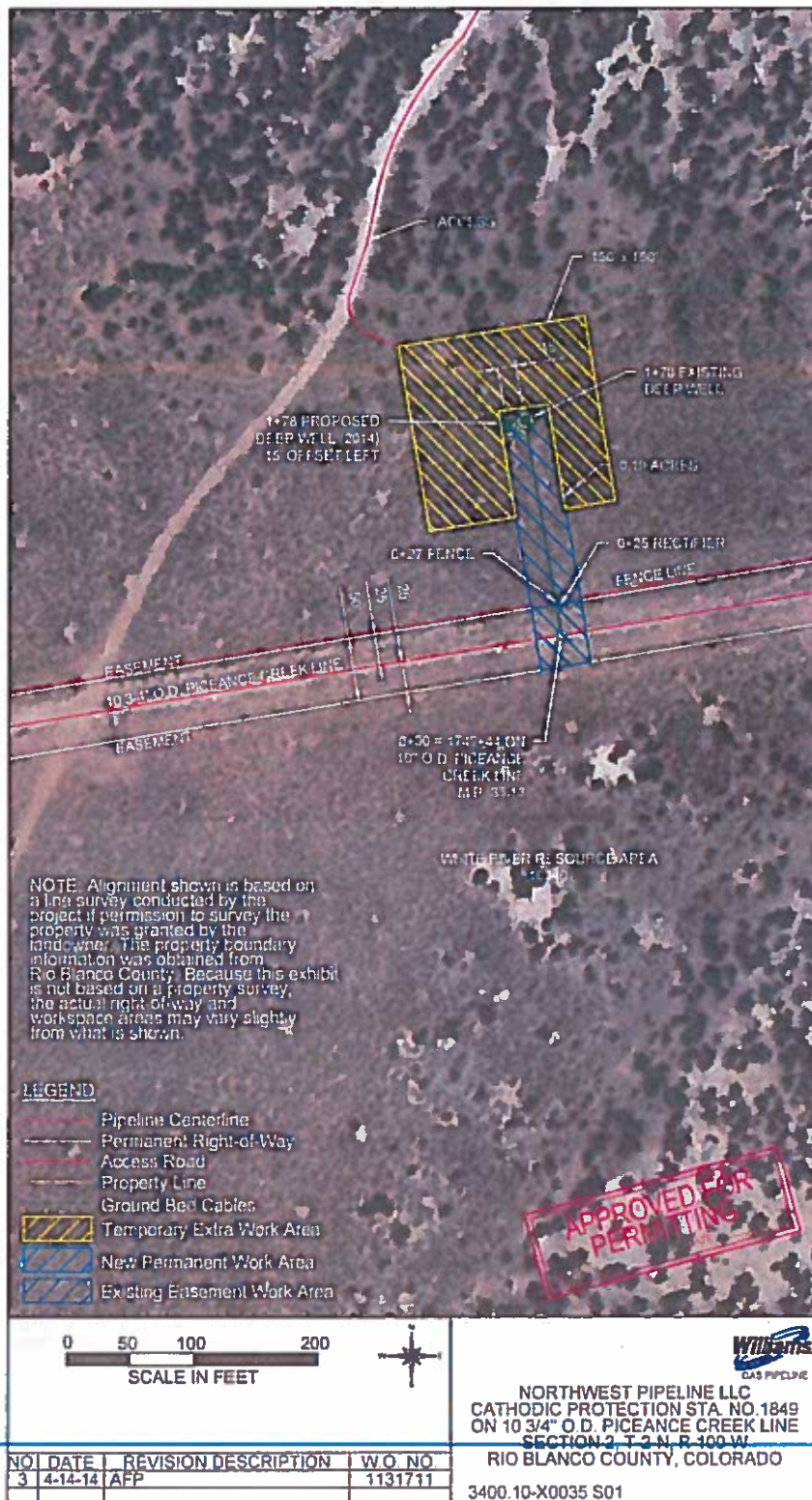
Field Manager

DATE SIGNED:

A handwritten date "09/09/2014" in blue ink.

ATTACHMENTS: Exhibit A – Maps of Proposed Action





NOTE: Alignment shown is based on a line survey conducted by the project if permission to survey the property was granted by the landowner. The property boundary information was obtained from Rio Blanco County. Because this exhibit is not based on a property survey, the actual right of way and workspace areas may vary slightly from what is shown.

- LEGEND**
- Pipeline Centerline
 - Permanent Right-of-Way
 - Access Road
 - Property Line
 - Ground Bed Cables
 - Temporary Extra Work Area
 - New Permanent Work Area
 - Existing Easement Work Area



Williams
GAS PIPELINE

NORTHWEST PIPELINE LLC
CATHODIC PROTECTION STA. NO. 1849
ON 10 3/4" O.D. PICEANCE CREEK LINE
SECTION 2, T-3-N, R-100-W
RIO BLANCO COUNTY, COLORADO
3400.10-X0035 S01

NO.	DATE	REVISION DESCRIPTION	W.O. NO.
3	4-14-14	APP	1131711

**U.S. Department of the Interior
Bureau of Land Management
White River Field Office
220 E Market St
Meeker, CO 81641**

DECISION RECORD

PROJECT NAME: NWP Temporary Work Areas For CPS 674 and CPS 1849

CATEGORICAL EXCLUSION NUMBER: DOI-BLM-CO-N05-2014-0109-CX

DECISION

It is my decision to implement the Proposed Action, as mitigated in DOI-BLM-CO-N05-2014-0109-CX, authorizing the construction, operation, and maintenance of temporary work areas for CPS 674 and CPS 1849.

Mitigation Measures

1. All applicable terms and conditions of the right-of-way grants for the cathodic protection sites (COC73952 and COC74436) and the previously authorized temporary use permits (COC73952-01 and COC74436-01) shall be carried forward and remain in full force and effect.
2. The holder shall conduct all activities associated with the operation and termination of the right-of-way within the authorized limits of the right-of-way.
3. At least 90 days prior to termination of the right-of-way, the holder shall contact the Authorized Officer to arrange a joint inspection of the right-of-way. The inspection will result in the development of an acceptable termination and rehabilitation plan submitted by the holder. This plan shall include, but is not limited to, removal of facilities, drainage structures, and surface material; recontouring; topsoiling; or seeding. The Authorized Officer must approve the plan in writing prior to the holder's commencement of any termination activities.
4. The holder will be responsible for monitoring the right-of-way for occurrence of noxious weeds for the life of the project and appropriately treating weeds present. The holder will implement an integrated weed management plan according to BLM Manual 9015-Integrated Weed Management (BLM 1992). The weed management plan will include the submission of a Pesticide Use Proposal (PUP) to the BLM for the use of herbicides appropriate for control/eradication of the known noxious and invasive species along the proposed ROW including the species listed above. The PUP shall be filed in a timely manner such that weed treatment can begin in the first growing season after construction. Each fall the holder must submit a Pesticide Application Report (PAR) listing all weed treatments that occurred in association with this project.
5. All construction activity shall cease when soils or access routes become saturated to a depth of three inches unless there are safety concerns or activities are otherwise approved by the

authorized officer.

6. In order to protect public land health standards for soils, erosion features such as rilling, gullyng, piping and mass wasting on the surface disturbance or adjacent to the surface disturbance as a result of this action will be addressed immediately after observation by contacting the AO and by submitting a plan to assure successful soil stabilization with BMPs to address erosion problems.

7. As a reasonable and prudent ROW holder acting in good faith, the holder will report all emissions or releases that may pose a risk of harm to human health or the environment, regardless of a substance's status as exempt or nonexempt and regardless of fault, to the BLM WRFO (970) 878-3800.

8. As a reasonable and prudent ROW holder, acting in good faith, the holder will provide for the immediate clean-up and testing of air, water (surface and/or ground), and soils contaminated by the emission or release of any substance that may pose a risk of harm to human health or the environment, regardless of that substance's status as exempt or non-exempt. Where the holder fails, refuses, or neglects to provide for the immediate clean-up and testing of air, water (surface and/or ground), and soils contaminated by the emission or release of any quantity of a substance that poses a risk of harm to human health or the environment, the BLM WRFO may take measures to clean-up and test air, water (surface and/or ground), and soils at the holder's expense. Such action will not relieve the holder of any liability or responsibility.

9. Where required by law or regulation to develop a plan for the prevention of releases or the recovery of a release of any substance that poses a risk of harm to human health or the environment, the holder will provide a current copy of said plan to the BLM WRFO.

10. Construction sites and all facilities shall be maintained in a sanitary condition at all times; waste materials shall be disposed of promptly at an appropriate waste disposal site. "Waste" means all discarded matter including, but not limited to, human waste, trash, garbage, refuse, oil drums, petroleum products, ashes, and equipment.

11. Comply with all Federal, State and/or local laws, rules and regulations, including but not limited to onshore orders and notices to lessees, addressing the emission of and/or the handling, use, and release of any substance that poses a risk of harm to human health or the environment. All spills or leakages of oil, gas, produced water, toxic liquids or waste materials, blowouts, fires, shall be reported by the operator in accordance with the regulations and as prescribed in applicable orders or notices.

12. The holder shall be responsible for achieving a reclamation success rate equal to a minimum cover and composition of 80 percent of the Desired Plant Community (as defined by the ecological site, in an early-seral state) or in relation to the seed mix applied within three growing seasons after the application of seed. This community must be capable of persisting on the site without intervention and allow for successional processes consistent with achieving the seral stage on the site prior to surface disturbance.

13. Reclamation achievement will be evaluated using the Public Land Health Standards that include Indicators of Rangeland Health. If BLM determines that reclamation success is below an acceptable level, reclamation efforts must be repeated at the holder's expense until vegetation is successfully established.

14. In accordance with the 1997 White River RMP/ROD, all trees removed in the process of construction shall be purchased from the BLM.

15. Trees that must be removed for construction shall be cut down to a stump height of six inches or less prior to heavy equipment operation. These trees shall be cut in four foot lengths (down to four inches diameter) and placed in manageable stacks immediately adjacent to a public road to facilitate removal for company use or removal by the public. Branches from cut trees will be scattered throughout the project area making sure not to creating a stockpile of wood debris.

16. All activities would be required to comply with all applicable local, state, and federal laws, statutes, regulations, standards, and implementation plans. This would include acquiring all required State and Rio Blanco County permits, implementing all applicable mitigation measures required by each permit, and effectively coordinating with existing ROW holders.

17. All construction and vehicular traffic shall be confined to the right-of-way or designated access routes, roads, or trails unless otherwise authorized in writing by the authorized officer. All temporary roads used for construction shall be rehabilitated after construction is completed.

COMPLIANCE WITH LAWS & CONFORMANCE WITH THE LAND USE PLAN

This decision is in compliance with the Endangered Species Act and the National Historic Preservation Act. It is also in conformance with the 1997 White River Record of Decision/Approved Resource Management Plan.

PUBLIC INVOLVEMENT

The BLM informed the public about this project by listing it on the online WRFO NEPA Register on 7/31/2014 and a copy of the completed CX will be posted on the WRFO website.

RATIONALE


The Proposed Action is categorically excluded from further documentation under the National Environmental Policy Act (NEPA) in accordance with 516 DM 11.9, E19. This categorical exclusion is appropriate in this situation because there are no extraordinary circumstances potentially having effects that may significantly affect the environment. The Proposed Action has been reviewed, and none of the extraordinary circumstances described in 43 CFR 46.215 apply. Approval of the CPS sites keeps the pipelines in safe working order.

ADMINISTRATIVE REMEDIES

This decision shall take effect immediately upon the date it is signed by the Authorized Officer and shall remain in effect while any appeal is pending unless the Interior Board of Land Appeals issues a stay (43 CFR 2801.10(b)). Any appeal of this decision must follow the procedures set forth in 43 CFR Part 4. Within 30 days of the decision, a Notice of Appeal must be filed in the office of the Authorized Officer at White River Field Office, 220 East Market St., Meeker, CO

81641 with copies sent to the Regional Solicitor, Rocky Mountain Region, 755 Parfet St., Suite 151, Lakewood, CO 80215, and to the Department of the Interior, Board of Land Appeals, 801 North Quincy St., MS300-QC, Arlington, VA, 22203. If a statement of reasons for the appeal is not included with the notice, it must be filed with the Interior Board of Land Appeals at the above address within 30 days after the Notice of Appeal is filed with the Authorized Officer.

SIGNATURE OF AUTHORIZED OFFICIAL:

A handwritten signature in blue ink, appearing to read "Thomas E. Walter", written over a horizontal line.

Field Manager

DATE SIGNED:

09/09/2014